

1 Richard A. Harpootlian, *pro hac vice*  
*rah@harpootlianlaw.com*  
2 Phillip Barber, *pro hac vice*  
*pdb@harpootlianlaw.com*  
3 RICHARD A. HARPOOTLIAN, PA  
1410 Laurel Street  
4 Columbia, South Carolina 29201  
Telephone: (803) 252-4848  
5 Facsimile: (803) 252-4810  
6 Bryan M. Sullivan, State Bar Number 209743  
*bsullivan@earlysullivan.com*  
7 Zachary C. Hansen, State Bar Number 325128  
*zhansen@earlysullivan.com*  
8 EARLY SULLIVAN WRIGHT  
GIZER & MCRAE LLP  
9 6420 Wilshire Boulevard, 17<sup>th</sup> Floor  
Los Angeles, California 90048  
10 Telephone: (323) 301-4660  
Facsimile: (323) 301-4676  
11 Attorneys for PLAINTIFF  
12 ROBERT HUNTER BIDEN

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**  
15 **WESTERN DIVISION**

16 ROBERT HUNTER BIDEN, an  
individual,

17 Plaintiff,

18 vs.

19 PATRICK M. BYRNE, an individual,

20 Defendant.

21 Case No. 2:23-cv-09430-SVW-PD

22 **AMENDED JOINT WITNESS LIST**

23 **Pretrial Conference:** **July 21, 2025**

24 **Time:** **3:00 p.m.**

25 **Jury Trial** **July 29, 2025**

26 **Time:** **9:00 a.m.**

27  
28 Judge: Hon. Stephen V. Wilson,  
Ctrm. 10A

1 Pursuant to Fed. R. Civ. P. 16 and Local Rule 16-5, Plaintiff Robert Hunter  
2 Biden (“Plaintiff”) and Defendant Patrick Byrne (“Defendant”) hereby submit the  
3 following proposed Joint Witness List. Plaintiff and Defendant expressly reserve the  
4 right to amend the Joint Witness List to add witnesses identified as a result of any  
5 additional discovery and as may be necessary for impeachment, rebuttal, or otherwise  
6 based upon the evidence adduced at trial.

7 \*Indicated that witness will be called only if need arises.

8 **Case Title:** Robert Hunter Biden v. Patrick M. Byrne

9 **Case No:** 2:23-cv-09430-SVW-PD

10 **PLAINTIFF’S WITNESS LIST**

11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	2

1 2 3 4	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Witness's Name*, Phone Number, Address	Summary of Testimony / Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)	Dates of Testimony
			family's lives. Mr. Biden will also testify about his own personal history. Mr. Biden will testify about the impact Defendant's defamatory statements have had on his and his family's social life, particularly within the Jewish community. This witness will testify live. Plaintiff will also be cross-examined.			
		Patrick M. Byrne, c/o Law Offices of Michael C. Murphy, 2625 Townsgate Road, Suite 330, Westlake Village, CA 91361; (818) 558-3718	Mr. Byrne is the defendant in this matter and has knowledge about the defamatory statements he made about Plaintiff, including the evidentiary basis (or lack thereof), the falsity of those statements, what processes he went through to verify his defamatory statements before he made them, and what he relied upon in making such defamatory statements. Mr. Byrne has knowledge of his own political biases, his actual malice toward Plaintiff and his family, his affiliations with right-wing groups and people, and his general motivations behind making	8.00	7 hours	

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Witness's Name*, Phone Number, Address	Summary of Testimony / Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)	Dates of Testimony
			the defamatory statements. Mr. Byrne will also have knowledge about the publication of the defamatory statements and the republication of the same statements in various interviews, social media posts, books, and visual productions. Mr. Byrne will also have knowledge about the evidence he claims supports his defenses in this action. This witness is expected to testify live, however if he refuses to appear at trial, his testimony will be presented via designated deposition transcripts.			
		David Smith, c/o Samuel Bean, Esq., U.S. Department of Justice, Civil Division, Federal Programs Branch, 1100 L Street, N.W., Washington, DC 20005, (202) 455-9619	Mr. Smith was identified by Defendant as a possible witness and the person who verified the voicemails Defendant claims supports his defenses in this matter. Mr. Smith has information about Defendant's claims regarding the validity of the sources he relied upon in making his defamatory statements, the lack of evidentiary support thereof, and facts supporting Plaintiff's claims. This	1 hour		

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Witness's Name*, Phone Number, Address	Summary of Testimony / Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)	Dates of Testimony
			witness's testimony will be presented by designated portions of his deposition transcript.			
		John F. Moynihan, c/o Brian Della Rocca, Esq., Della Rocca Law LLC, 9801 Washington Blvd., Ste. 710, Gaithersburg, Maryland 20878, (240) 455-5090.	Mr. Moynihan has information about Defendant's claims regarding the validity of the sources he relied upon in making his defamatory statements, the lack of evidentiary support thereof, and facts supporting Plaintiff's claims. This witness's testimony will be presented by designated portions of his deposition transcript	1 hour	4.00	
		*Melissa Cohen-Biden, c/o Early Sullivan Wright Gizer & McRae LLP, 6420 Wilshire Blvd., 17 <sup>th</sup> Fl., Los Angeles, CA 90048; (323) 301-4660	Mrs. Cohen-Biden is the wife of the Plaintiff, Mr. Biden. Mrs. Cohen-Biden has knowledge concerning the statements made by the Defendant, including the falsity of those statements and evidence supporting the same. If called, Mrs. Cohen-Biden will testify about her knowledge of the statements made by Defendant about Mr. Biden, including a timeline of harassment and malice from Defendant directed at		2 hours	

Witness's Name*, Phone Number, Address	Summary of Testimony / Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)	Dates of Testimony
	<p>Mr. Biden and his family, both before the statements were published and after. Mrs. Cohen-Biden will testify about how Defendant's statements impacted her husband's mental health and caused him emotional distress. Mrs. Cohen-Biden will testify about the impact Defendant's statements have had on her husband's and her family's social life, particularly within the Jewish community. If called, this witness will testify live.</p>			

## DEFENDANT'S WITNESS LIST

Witness's Name*, Phone Number, Address	Summary of Testimony / Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)	Dates of Testimony
Nathan E. Lavid, MD; 65 Pine Ave., Long Beach, CA 90802; (562) 912- 4646	Dr. Lavid conducted an IME of Plaintiff including testing. He will testify that Plaintiff did not suffer from any type of severe or emotional distress and damages from Defendant's statements	2.00	1 hour	

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	
Witness's Name*, Phone Number, Address	Summary of Testimony / Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)	Dates of Testimony																								
	due to his lack of impairment of doing daily living and his emotional stress is caused by the numerous stressors in his life that have nothing to do with Defendant's statements in this case. .																											
Mr. Garrett Ziegler, 2817 Reed Rd., Suite 2, Bloomington, IL 61704, (309) 306-1391.	Mr. Garrett is involved in the publication and sale of a publication commonly known as the "Report on the Biden Laptop" on or about October 19, 2022 that contains 636 pages of statements that attack the credibility and character of Plaintiff that is irrelevant to show that Plaintiff has a long standing bad reputation and from information he obtained from his laptop.	2.00	1 hour																									
Mr. Konstantinos "Gus" Dimitrelos; Cyber Forensics, 921 Connie St., Casper, WY 82604, (307) 439-5440.	Mr. Dimitrelos has knowledge and information regarding the authenticity of the information contained on Plaintiff's laptop and that the information was correctly published throughout the media world throughout the United States that tainted Plaintiff's	1.00	1 hour																									

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	Witness's Name*, Phone Number, Address	Summary of Testimony / Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)	Dates of Testimony
																												reputation.				
																												Patrick M. Byrne, c/o Law Offices of Michael C. Murphy, 2625 Townsgate Road, Suite 330, Westlake Village, CA 91361; (818) 558-3718	Mr. Byrne is the defendant in this matter and has knowledge about the statements he made about Plaintiff, including the evidentiary basis, his belief that the information contained in the statements were true and he had no serious doubts the statements were true, what processes he went through to verify his statements before he made them, and what he relied upon in making such statements. Mr. Byrne will also have knowledge about the publication of the statements and the republication of the same statements in various interviews, social media posts, books, and visual productions. Mr. Byrne will also have knowledge about the evidence he claims supports his defenses in this action.	8.00	5 hours	
																												John Moynihan; FJM & Associates, LLC, 48 Kenwood, Worcester, MA	Mr. Moynihan has information about the authentication of the tapes	4.00	1 hour	

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Witness's Name*, Phone Number, Address	Summary of Testimony / Why Testimony Unique	Time for Direct Exam (hours)	Time for Cross Exam (hours)	Dates of Testimony
	01665; (313) 410-6872	produced in discovery			

Pursuant to Local Rule 16-8.2, Defendant reserves the right to amend the joint witness list prior to and at the final Pretrial Conference of this case. Simply because a witness is added to this witness list does not mean that there is an agreement that the witness can be called to testify during trial and even on an “as needed” basis.

Dated: July 16, 2025

EARLY SULLIVAN WRIGHT  
GIZER & MCRAE LLP

By: /s/ Zachary C. Hansen  
BRYAN M. SULLIVAN (State Bar No. 209743)  
bsullivan@earlysullivan.com  
ZACHARY C. HANSEN (State Bar No. 325128)  
zhansen@earlysullivan.com  
EARLY SULLIVAN WRIGHT GIZER & MCRAE LLP  
6420 Wilshire Boulevard, 17th Fl.  
Los Angeles, California 90048  
Telephone: (323) 301-4660  
Facsimile: (323) 301-4676

Richard A. Harpoonian, *pro hac vice*  
*rah@harpoonianlaw.com*  
Phillip Barber, *pro hac vice*  
*pdb@harpoonianlaw.com*  
RICHARD A. HARPOONIAN, PA  
1410 Laurel Street  
Columbia, South Carolina 29201  
Telephone: (803) 252-4848  
Facsimile: (803) 252-4810

*Attorneys for Plaintiff*  
*Robert Hunter Biden*

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5 Dated: July 16, 2025

LAW OFFICES OF MICHAEL C. MURPHY

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8 By: /s/ Michael C. Murphy

9 Michael C. Murphy, Esq.

10 Michael C. Murphy, Jr., Esq.

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12 *Attorneys for Defendant*

13 *Patrick Byrne*

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